

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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KATHRYN KNOWLTON, *et al.*,

Plaintiff,

Case No. 20-CV- 01660

v.

CITY OF WAUWATOSA, *et al.*,

Defendants.

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**STIPULATED FINDINGS OF FACT**

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Defendants by their attorneys, Wirth + Baynard and Plaintiffs by their attorney Kimberly Motley submit these Stipulated Findings of Fact in Support of their Motions for Summary Judgment.

**The Parties**

1. Defendant City of Wauwatosa is a municipality incorporated in the State of Wisconsin. (ECF No. 155, ¶ 88)
2. At all relevant times, Defendant Jeffrey Farina worked for the City of Wauwatosa, as a Police Officer. (Farina Deposition pp. 10, 16)
3. At all relevant times, Defendant Joseph Roy was a City of Wauwatosa, Wisconsin Police Lt. assigned to oversee the open records division. (Roy Deposition p. 20)
4. At all relevant times, Defendant Dominick Ratkowski was a crime analyst for the City of Wauwatosa. (Ratkowski Deposition p. 16)
5. At all relevant times, Defendant Dennis McBride was the City of Wauwatosa, Wisconsin Mayor. (McBride Deposition p. 6)

### **Jurisdiction and Venue**

6. This action arises under the First Amendment to the United States Constitution, 42 U.S.C. § 1983, 18 U.S.C. § 2722, 18 U.S.C. §2721, Title VI, 18 U.S.C., and 18 U.S.C. §2721 the Driver's Privacy Protection Act. The Court has jurisdiction over Plaintiffs' federal claims pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3) and (4), 28 U.S.C. §§2201, 2202 (declaratory judgment jurisdiction), and 28 U.S.C. §1367 (supplemental jurisdiction).

7. The Eastern District of Wisconsin is the proper venue for this action pursuant to 28 U.S.C. § 1391(b) because it is where all acts alleged in the Fourth Amended Complaint occurred. (ECF No. 155, ¶ 23)

### **First Claim for Relief September 30, 2020, Proclamation of Emergency**

8. Parties stipulate to the authenticity of the Proclamation of Emergency as attached. (See **McBride Exhibit A**: Proclamation of Emergency).

### **Second Claim for Relief-Ratkowski List**

9. On or around June 5, 2020, Dominick Ratkowski, a civilian crime analyst hired by the City of Wauwatosa created a list. (See **Ratkowski Exhibit A**; Ratkowski Deposition p. 125-126)

### **Fourteenth Claim for Relief-January 7, 2021, Open Records Response**

10. On January 7, 2021, Joseph Roy released unredacted documents by providing a dropbox link to documents which included Wauwatosa Police Department police reports, citations, squad and body camera video as well as videos and reports produced from other agencies.

11. On October 9, 2020, Aidali Rivera was arrested in the City of Wauwatosa.

12. On or about September 5, 2020, Rosalind Rogers was arrested in the City of Wauwatosa.

13. On or about September 5, 2020, Isiah Baldwin was arrested in the City of Wauwatosa.

Dated: December 19, 2022

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